

DOA: 3/31/2025

UNITED STATES DISTRICT COURT

for the
District of ArizonaUnited States of America
v.
Nicholas Anthony Lawrence
A #203 085 304) Case No. 25-8218 MJ
)
)*Defendant*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about March 31, 2025, in Maricopa County, in the District of Arizona, the defendant violated Title 8, United States Code, Section 1326(a) (Reentry of Removed Alien), an offense described as follows:

Nicholas Anthony Lawrence, an alien, was found in the United States at or near Mesa, in the District of Arizona, after having been previously denied admission, excluded, deported, and removed from the United States at or near Alexandria, Louisiana, on or about November 3, 2022 and not having obtained the express consent of the Attorney General or the Secretary of Homeland Security to reapply for admission to the United States, in violation of Title 8, United States Code, Section 1326(a), and enhanced by (b)(1) (Reentry of Removed Alien). I further state that I am a Deportation Officer.

This criminal complaint is based on these facts:

See Attached Statement of Probable Cause Incorporated By Reference Herein

CHARLES BAILEY

Digitally signed by CHARLES BAILEY
Date: 2025.04.01 12:55:55 -07'00'

AUTHORIZED BY: Charles E. Bailey Jr., P.S. for AUSA Ross Arellano Edwards

Continued on the attached sheet.

VICTOR M GONZALEZ JR. Digitally signed by VICTOR M GONZALEZ JR
Date: 2025.04.01 13:07:59 -07'00'*Complainant's signature*Victor Gonzalez
ICE Deportation Officer*Printed name and title**QBn**Judge's signature*John Z. Boyle
United States Magistrate Judge*Printed name and title*

City and state: Phoenix, Arizona

STATEMENT OF PROBABLE CAUSE

I, Deportation Officer Victor Gonzalez, declare under penalty of perjury that the following is true and correct.

1. I am a Deportation Officer. I have learned the facts recited herein from direct participation in the investigation and from the reports and communications of other agents and officers.
2. On or about March 28, 2025, the Immigration and Customs Enforcement Mobile Criminal Apprehension Team (ICE MCAT) received information from the Homeland Security Investigations tipline alleging that Nicholas Anthony Lawrence, a previously removed alien, was unlawfully present in the United States. ICE MCAT officers initiated an investigation to locate Lawrence. On or about March 31, 2025, ICE MCAT officers encountered Lawrence after conducting surveillance and performing a vehicle stop in Mesa, Arizona. ICE MCAT officers determined Lawrence to be a citizen of Jamaica, unlawfully present in the United States. Lawrence was taken into custody and transported to the Florence ICE office for further investigation and processing. Lawrence was held in administrative custody until his criminal and immigration records could be obtained and his identity confirmed.
3. Immigration history checks revealed Nicholas Anthony Lawrence to be a citizen of Jamaica and a previously deported alien. Lawrence was removed from the United States to Jamaica, through Alexandria, Louisiana, on or about November 3, 2022,

pursuant to a final order of removal issued by an immigration judge. There is no record of Lawrence in any Department of Homeland Security database to suggest that he obtained permission from the Secretary of the Department of Homeland Security to return to the United States after his last removal. Lawrence's immigration history was matched to him by electronic fingerprint comparison.

4. Criminal history checks revealed that on or about December 4, 2017, Nicholas Anthony Lawrence was convicted of Attempt to Commit Molestation of Child, and Attempt to Commit Sexual Conduct with Minor, both felony offenses, in the Superior Court of Arizona, County of Maricopa. Lawrence was sentenced to seven (7) years of imprisonment, and lifetime probation, respectively. Lawrence's criminal history was matched to him by electronic fingerprint comparison
5. On or about March 31, 2025, Nicholas Anthony Lawrence was advised of his constitutional rights. Lawrence freely and willingly acknowledged his rights but did not agree to provide a statement under oath. However, during his initial encounter with ICE officers, Lawrence admitted that he did not have any legal status to be or remain in the United States.
6. For these reasons, this affiant submits that there is probable cause to believe that on or about March 31, 2025, Nicholas Anthony Lawrence, an alien, was found in the United States at or near Mesa in the District of Arizona, after having been previously denied admission, excluded, deported, or removed from the United States at or near

Alexandria, Louisiana, on or about November 3, 2022, and not having obtained the express consent of the Secretary of the Department of Homeland Security to reapply for admission to the United States, in violation of Title 8, United States Code, Section 1326(a), and enhanced by (b)(1) (Reentry of Removed Alien).

7. This affidavit was sworn to telephonically before a United States Magistrate Judge legally authorized to administer an oath for this purpose. I have thoroughly reviewed the affidavit and the attachments to it, and attest that there is sufficient evidence to establish probable cause that the defendant violated Title 8, United States Code, Section 1326(a), and enhanced by (b)(1) (Reentry of Removed Alien).

VICTOR M GONZALEZ JR Digitally signed by VICTOR M GONZALEZ JR
Date: 2025.04.01 13:09:32 -07'00'

Victor Gonzalez,
Deportation Officer
Immigration and Customs Enforcement

Sworn to telephonically on
April 1, 2025

QBnL
John Z. Boyle
United States Magistrate Judge